

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

ROBERT V. TOWNES, IV,
Individually and on behalf of
all persons similarly situated,

Plaintiff,

v.

TRANSUNION, LLC and
TRUELINK, INC.,

Defendants.

Civil Action No. 04-1488-JJF

Class Action

Demand for Jury Trial

**STIPULATION AND [PROPOSED] ORDER
MODIFYING SECOND AMENDED RULE 16 SCHEDULING ORDER**

The parties hereby stipulate and agree, subject to the approval of the Court, that the Second Amended Rule 16 Scheduling Order entered by this Court on November 30, 2006 (D.I. 60) is hereby modified in the following respects:

1. Paragraph 4(a) is modified in that the January 31, 2007 deadline for the completion of initial discovery is hereby extended to March 14, 2007.
2. Paragraph 8 is modified in that the January 31, 2007 deadline for plaintiff to file any motion for class certification together with an opening brief, is hereby extended to March 14, 2007.
3. The Second Amended Scheduling Order shall remain in full force and effect in all other respects.

ROSENTHAL, MONHAIT & GODDESS, P.A.

MORRIS, NICHOLS, ARSHT & TUNNELL

By: /s/ Carmella P. Keener

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*Attorneys for Defendants, TransUnion, LLC
and TrueLink, Inc.*

SO ORDERED this _____ day of _____, 2007.

U.S.D.J.

CERTIFICATE OF SERVICE

I, Carmella P. Keener, hereby certify that on this 24th day of January, 2007, I electronically filed **STIPULATION AND [PROPOSED] ORDER MODIFYING SECOND AMENDED RULE 16 SCHEDULING ORDER** with the Clerk of the Court using CM/ECF, which will send notification of such filing to the following:

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